UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

ARNOUSE DIGITAL DEVICES CORP.,)	
Plaintiff, v.)	
)	Case No. 5:11-cv-155
)	
MOTOROLA MOBILITY LLC,)	
Defendant.)	

PLAINTIFF ARNOUSE DIGITAL DEVICES CORPORATION'S MOTION TO STAY LITIGATION AND MEMORANDUM IN SUPPORT

Plaintiff Arnouse Digital Devices Corp. ("Arnouse") hereby moves to stay this case pending the outcome of *Inter Partes* Review No. IPR2013-00010 (the "IPR") filed by Defendant Motorola Mobility LLC ("MML") in the United States Patent and Trademark Office ("PTO"). The petition for IPR ("IPR Petition") filed by MML seeks cancellation of claims 1, 3, 7, 15, 16,18 and 20 of U.S. Patent No. 7,516,484 (the "Patent") based on various prior art references cited by MML.

A stay of the present litigation is warranted because the IPR will result in either confirmation of the patentability of claims of the Patent undergoing review or amendment or cancellation of some or all of such claims. These determinations by the PTO may aid this Court in its consideration of the substantive issues raised in the litigation.

If this motion is granted, Plaintiff will promptly advise the Court of the outcome of the IPR and at that point move that the stay be lifted in order to permit the resolution of this case.

This is to certify that despite request, the Defendant MML has declined to stipulated that this motion may be granted.

October 15, 2012

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ATTORNEYS FOR PLAINTIFF ARNOUSE DIGITAL DEVICES CORP.

UNITED STATES DISTRICT COURT

DISTRICT OF VERMONT

I hereby certify that on October 15, 2012, I electronically filed Plaintiff's Motion to Stay Litigation with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following: Samuel Hoar, Jr., Esq.

/s/ R. Bradford Fawley

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